

Federal Defenders OF NEW YORK, INC.

Southern District
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July 16, 2021


BY EMAIL

Honorable Lewis J. Lima
United States District Judge
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007

REQUEST GRANTED.

The Court approves modification to
bail as proposed.

7/16/2021 SO ORDERED.


LEWIS J. LIMAN
United States District Judge

Re: United States v. Jesus Alberto Brito Maldonado
21 CR. 167 (LJL)

Dear Judge Liman,

With the consent of the Government and Pretrial, I respectfully write on behalf of my client, Jesus Brito, to request that he be placed on curfew enforced by electronic monitoring, with a curfew to be set by Pretrial.

On 2/12/2021, the following bail conditions were set for Mr. Brito by Judge Gorenstein: \$50,000 PRB; 3 FRP'S; Travel Limited to SDNY/EDNY; Surrender Travel Documents (family must turn in his US and Dominican Passport); Pretrial Supervision As Directed by PTS; Deft to Submit to Urinalysis, If Positive, Add Condition of Drug Testing/Treatment; Home Incarceration; Electronic Monitoring; Deft Not to Possess Firearm/Destructive Device/Other Weapon. His conditions were modified shortly after his release to allow him to go to the hospital for the birth of his first child. Mr. Brito has been fully compliant with his conditions of release. His conditions were further modified April 29, 2021, to allow Mr. Brito to be placed on home detention.

I request that Mr. Brito be placed on a curfew set by Pretrial to expand his work opportunities and to allow Mr. Brito the ability to visit his new born daughter who resides separately with her mother. Currently, Mr. Brito is working as a coach and trainer but unable to attend certain games and training sessions because of the requirement for stationary employment while on home detention. Moreover, he is only able to visit with his daughter when her mother is able to bring her to him which has been difficult to coordinate with their schedules and has resulted in many missed visits. As mentioned above, the Government and Pretrial consent to this request.

Respectfully submitted,

/s/ _____

Zawadi Baharanyi
Assistant Federal Defender
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cc: AUSA Jonathan Bodansky.